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October 25, 2013

Ms. Ingrid H. Hopkins
Water Protection Division (3WP42)
US EPA – Region III
1650 Arch Street
Philadelphia, PA 19103-3029
(215) 814-5437
hopkins.ingrid@epa.gov

RE: Benning Road Generating Station – NPDES Permit No. DC 0000094
Total Suspended Solids and Metal Excursions– Outfall 013Q

Dear Ms. Hopkins,

This letter is a follow-up to the October 21, 2013 telephone notification, made on behalf of Pepco Energy Services, Inc. by Ms. Heather Brinkerhoff of HB Consulting LLC., to report daily maximum TSS, Copper, Lead, Iron and Zinc excursions from a storm water grab sample taken on October 07, 2013 from Outfall 013.

On October 21, 2013 Ms. Brinkerhoff received the laboratory analysis indicating that the daily maximum concentrations for TSS, Copper, Lead, Iron and Zinc were exceeded. Ms. Brinkerhoff made the required telephone notification to the US Environmental Protection Agency (EPA) in accordance with NPDES permit condition VI.6.

The results of the laboratory analyses for TSS, Copper, Lead, Iron and Zinc are shown in the following table:

Analyte	Units	Permit Limit Daily Max	Results
TSS	mg/L	100	170
Copper	ug/L	13.44	64
Lead	ug/L	64.58	65
Iron	mg/L	1.00	9.4
Zinc	ug/L	117.18	540

As discussed in our prior correspondence, on July 19, 2010, the facility submitted a TMDL Implementation Plan to EPA as required by the facility's NPDES permit. The TMDL Plan provided information on past, current, and planned activities at the facility to meet the required load reductions for

the Anacostia River TMDLs for metals. EPA approved the plan and the facility completed the implementation of Phase I (inlet maintenance) and Phase II (metal management) control measures as of December 2012. This included installing metal absorbing filter guards in storm drains throughout the facility; installing sediment removal and oil absorbing booms around storm drain inlets; and removing or covering stored metal and equipment exposed to the weather. We are also evaluating additional measures to further reduce pollutant concentrations and to help achieve consistent compliance with the permit limits. The next step includes implementation of Phase III control measures as identified in the TMDL Plan (i.e., installation of additional LID structures).

We believe the high results received from this sampling event are associated with increased turbidity. The intensity of the storm and initial heavy down pour likely contributed to a scouring effect, increasing the metals concentrations and increasing the TSS levels. Local climatological data shows 0.66 inches of rain fell within the first hour of the storm. Therefore the calculated flow rate for Outfall 013 for this event is 6.18 ft3/sec, significantly higher than typical and historical storm sampling events (average flow rate for the last 5 storm events is 1.53 ft3/sec). Because the high metals concentrations measured during the October 7th sampling event appear to be attributable principally to the intensity of the storm event that day, we do not believe that these concentrations are representative of normal storm water quality at the site.

Please contact me at (703) 253-1787 or by electronic mail at mwilliams@pepcoenergy.com if you need additional information.

Respectfully yours,

Michael V. Williams
Power Plant Asset Manager
Pepco Energy Services, Inc.